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December 13, 2016

Mr. Peter Doyle, Chief AM Branch
FEDERAL COMMUNICATIONS COMMISSION
445 12TH ST. S.W.
Washington, D. C. 20554

RE: 1800B3 TSN WA2XPA, WI2XSO, WI3XSO
LICENSE CANCELLATION LETTERS (addendum to
reconsideration petition)

Dear Mr. Doyle:

Any AM broadcaster should have the tools to improve its coverage since AM radio has multiple disabilities that deserve any help available. We do not oppose giving any AM broadcaster a chance to compete.

However, the FCC can be (perhaps inadvertently) really unfair. I'll give you an example of our competing network: NOTI-UNO. NotiUno is part of Uno Radio Group a company that owns: ONE (1) AM News Network and THREE (3) FM Music networks all of them having islandwide coverage.

WUNO-AM 630 San Juan, leading station of NOTIUNO, requests the FCC to move a translator one of its FM stations has from Hormigueros (75 miles of West of San Juan to San Juan, PR) during the second window for moving FM translators to assign it to an AM station. (WUNO is a class B station that would have to wait until the 4th window to apply for a translator). But the rules permit to assign an FM translator to WUNO ahead of any other Class A or B station.

While this is done under the FCC rules, **the FCC cripples the WAPA RADIO network**, shutting down three of its stations (boosters) and silencing WAPA on one-third of the island. The FCC knocks down WAPA at the same time Puerto Rico undergoes a historical severe economical crisis. The AM synchronous boosters gave WAPA the prestige to be recognized as an islandwide network. WAPA does not have any other FM stations to support its operation. I only own the WAPA-AM network. (composed only of AM stations, no FM translators).

I have noted that other stations in the continental U.S. continue operating AM synchronous boosters:

a) WBZT 1230 West Palm Beach, FL (main) / Pompano Beach, FL (booster) since 1994. (22 years)

WAPA-680-AM
San Juan

WA2XPA-680-AM
Arecibo

WISO-1260-AM
Ponce

WI2XSO-1260-AM
Mayagüez

WI3XSO-1260-AM
Aguadilla

WGYA-1590-AM
Guayama

WMTI-1580-AM
Morovis-Vega Baja-Manatí

LA PODEROSA CADENA WAPA RADIO

- b) KKOB 770 Albuquerque, N.M. (main) / Santa Fe N.M. (booster) since 1987 (29 years)
- c) WRJR Claremont, VA (main) / WR2XJR Portsmouth, VA (booster) since 2004 (12 years)
- d) KCOH Houston, Tx (main) / Houston Tx. (booster) since 1987 (29 years)
- e) WLLH Lowell, MA (main) / Lawrence, MA (booster) since 2001. This station is now asking the FCC to eliminate the main facility at Lowell and making the booster site as the main site, changing city license.

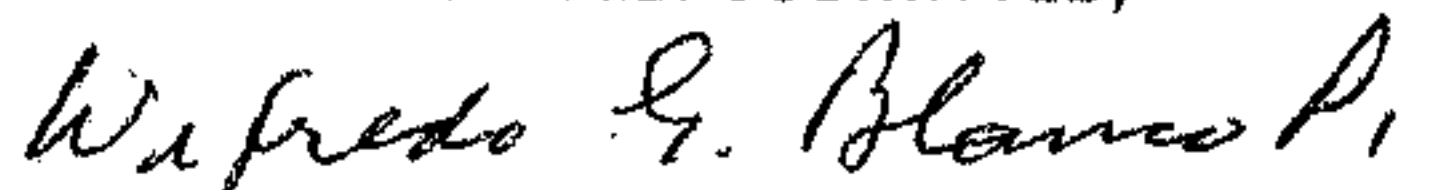
Apparently no license cancellation letters for these Continental U.S. AM boosters have been sent to them. (Information taken from CDBS files). The license cancellation to my boosters were made all on the same date November 7, 2016. The license cancellation to WI2XAC Ponce, P.R. was not issued until November 29, 2016 (several days after I raised the issue of discriminatory cancellation of our boosters). Is it because the most successful AM boosters have been those of WAPA and the FCC needs to dismantle them to discourage other broadcasters from requesting AM boosters; because we are a territory (colony) of the US; because I am a U.S. naturalized, Cuban immigrant; because WAPA-AM is the only media promoting statehood for Puerto Rico; or because we are not a powerful network having the capacity of hiring a Washington attorney firm to give the fight for survival.

When the U.S. Navy struggled to maintain its practice facilities at Vieques, P. R. the only station in Puerto Rico that supported them was WAPA-AM, the same station that has been promoting statehood for the Island since I acquired it. My point of views have mislead some people to argue that we were financed by the U.S government. Now, the U.S. government shuts down three of my network stations paradoxically the same thing the Cuban Revolution did to my station CMAX in Pinar del Rio, Cuba. (the third station seized by the Cuban Revolution).

These AM Synchronous boosters have a superb performance. No complaint has been raised on their operation. We believe the FCC should permit all AM stations that can use synchronous boosters to use them, but if there's no way to convince you, please grant a grandfather clause to all existing AM boosters in Puerto Rico (colony of the U.S.) and in the Continental U.S. so that they are made permanent.

I HAVE TO INSIST ON THE FACT THAT THE FCC NEVER WARNED ME THAT THE CONSTRUCTION PERMITS, LICENSES AND RENEWAL LICENSES GRANTED TO OUR BOOSTERS ANNUALLY WERE LIMITED TO A 5 YEAR EXPERIMENTATION PERIOD. THE SAME WAS STATED BY WI2XAC LICENSEE ALAN MEJIAS DAYS AFTER IN THEIR RECONSIDERATION LETTER.

RESPECTFULLY SUBMITTED,



ENG. WIFREDO G. BLANCO-PI